

Richard Alan Arnold, Esquire  
 William J. Blechman, Esquire  
 Kevin J. Murray, Esquire  
 Samuel J. Randall, Esquire  
 KENNY NACHWALTER, P.A.  
 201 S. Biscayne Boulevard, Suite 1100  
 Miami, Florida 33131  
 Tel: (305) 373-1000  
 Fax: (305) 372-1861  
 E-mail: [rarnold@knpa.com](mailto:rarnold@knpa.com)  
[wblechman@knpa.com](mailto:wblechman@knpa.com)  
[kmurray@knpa.com](mailto:kmurray@knpa.com)  
[randall@knpa.com](mailto:randall@knpa.com)

***Counsel for Plaintiffs Sears Roebuck and Co. and  
 Kmart Corp.***

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)  
 ANTITRUST LITIGATION

Master File Case No. 3:07-cv-05944-SC

MDL No. 1917

This Document Relates To:

*Siegel v. Hitachi, Ltd.*, No. 11-cv-05502;  
*Best Buy Co., Inc. v. Hitachi, Ltd.*, No. 11-  
 cv-05513;  
*Target Corp. v. Chunghwa Picture Tubes,  
 Ltd.*, No. 11-cv-05514;  
*Sears, Roebuck and Co., & Kmart Corp. v.  
 Chunghwa Picture Tubes, Ltd., et al.*, No.  
 11-cv-05514-SC;  
*Siegel v. Technicolor SA, et al.*, No. 13-  
 cv-05261;  
*Best Buy Co., Inc., et al. v. Technicolor SA,  
 et al.*, No. 13-cv-05264;  
*Sears, Roebuck and Co. and Kmart Corp.  
 v. Technicolor SA*, No. 3:13-cv-05262;

**DECLARATION OF SAMUEL  
 RANDALL IN SUPPORT OF DIRECT  
 ACTION PLAINTIFFS' RESPONSE IN  
 OPPOSITION TO DEFENDANTS'  
 MOTION IN *LIMINE* TO EXCLUDE  
 EVIDENCE OF "SPILLOVER" OR  
 "RIPPLE" EFFECTS OF FOREIGN  
 PRICE-FIXING ACTIVITIES ON U.S.  
 PRICES**

**[DEFENDANTS' MIL #8]**

The Honorable Samuel Conti

1 *Target Corp. v. Technicolor SA, et al.*, No.  
2 13-cv-05686;

3 *Viewsonic Corp. v. Chunghwa Picture*  
4 *Tubes, Ltd.*, No. 14-cv-02510

5 I, SAMUEL RANDALL, do testify as follows:

6 1. I am an attorney at the law firm Kenny Nachwalter, P.A., counsel of record for  
7 Plaintiffs Sears, Roebuck and Co., and Kmart Corporation in this action. This declaration is  
8 submitted in support of Direct Action Plaintiffs' Response in Opposition to Defendants' Motion  
9 in *Limine* to Exclude Evidence of "Spillover" or "Ripple" Effects of Foreign Price-Fixing  
10 Activities on U.S. Prices. The facts set forth here are based on my personal knowledge.

11 2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts of Rebuttal  
12 Expert Report of Dr. Kenneth G. Elzinga dated September 26, 2014. (FILED UNDER SEAL.)

13 3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of Rebuttal  
14 Report of Dr. James T. McClave dated September 26, 2014. (FILED UNDER SEAL.)

15 I declare under penalty of perjury under the laws of the State of Florida that the foregoing  
16 is true and correct.

17 Executed this 27th day of February, 2015, at Miami, Florida.

18 /s/ Samuel J. Randall

19 Samuel J. Randall  
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